

REMARKS

Applicant has carefully reviewed the Office Action of November 12, 2004 and offers the following remarks to accompany the above amendments.

Before addressing the rejections, Applicant provides a brief summary of the invention so that the remarks and amendments are considered in the proper context. The present invention is designed to provide location based content to mobile terminal users. There are two embodiments through which the location based content can be provided. In the first embodiment, the content provision is service-centric. That is, a service that resides in the mobile network associates unique URLs with different content providers and the service further associates location specific information with each URL. The service-centric embodiment is based on a push model where the location specific URLs for location specific content are automatically provided to the user's mobile terminal based on the mobile terminal's location. The specific URLs are closely tied to the specific location of the mobile terminal. By providing the mobile terminal with the specific URL corresponding to the current location of the mobile terminal, the present invention allows the user of the mobile terminal to access very specific content tailored to the current location of the user of the mobile terminal. To put this in the terms of the examples used in the specification: if a person stepped off a bus in San Francisco, California, she would have the URL for the San Francisco citysearch (www.bayareacitysearch.com) on her mobile terminal.

The second embodiment is a user-centric embodiment. In this embodiment, the user dictates the services to which she subscribes and when addresses or URLs are provided to the user. By providing the mobile terminal with the specific address corresponding to the specific location of the mobile terminal, the present invention allows the user of the mobile terminal to access very specific content tailored to the current location of the mobile terminal. Using the example of the specification, a user would subscribe to the citysearch service, and upon activating a trigger, would receive the URL for the local citysearch webpage based on the current location of the mobile terminal (e.g. www.bayareacitysearch.com). From the received URL, the user could access location specific content.

Claims 1-8, 11-22, 24-34, and 36-38 were rejected under 35 U.S.C. § 103 as being unpatentable over Owensby in view of Heddaya et al. (hereinafter "Heddaya"). Claims 9, 10, 23, and 35 were rejected under 35 U.S.C. § 103 as being unpatentable over Owensby, Heddaya, and Guedalia. Applicant respectfully traverses. For the Patent Office to establish obviousness, the

Patent Office must show where each and every element of the claim is taught or suggested in the combination of references. MPEP § 2143.03.

Claims 1-38 are canceled and the new claims recite establishing a plurality of unique internet protocol addresses from which unique location specific content can be accessed, determining a current location of the mobile terminal, identifying which address in the plurality corresponds to the current location, and delivering the identified address to the mobile terminal. The combination of Owensby and Heddaya does not show these elements. The Patent Office admits that Owensby does not teach or suggest using addresses. Likewise, Owensby does not teach that the advertisements described in Owensby are location specific. The advertisements are delivered based on the location of the mobile terminal, but there is no indication in Owensby's disclosure that the advertisements are location specific. The Patent Office relies on Heddaya to show multiple servers that have identical content thereon, effectively mirroring one another. However, this aspect of the specification is not claimed in the new claims. The new claims recite unique location specific content at each internet protocol address, and the appropriate address is then delivered to the mobile terminal. Heddaya's identical servers do not have unique location specific content associated with each of the addresses. Thus, Heddaya does not show the claim element either. Since the references individually do not teach or suggest the claim element, the combination of the references does not teach or suggest the addresses associated with unique location specific content as recited in the claim. Since the combination of references does not teach or suggest the claim element, the Patent Office has not established *prima facie* obviousness, and the claims are allowable.

Guedalia does not cure the deficiencies of the combination of Owensby and Heddaya. Thus, the combination of the three references does not establish *prima facie* obviousness, and the claims remain allowable.

Applicant requests reconsideration of the rejections and earnestly seeks claim allowance at the Examiner's earliest convenience.

Respectfully submitted,

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Date: February 11, 2005
Attorney Docket: 7000-091

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